

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

Qumotria Kennedy; Richard Tillery, on Behalf of
Themselves and All Others Similarly Situated;
Joseph Anderson;

Plaintiffs,

v.

The City of Biloxi, Mississippi; John Miller,
in his official capacity as Chief of Police of the City of
Biloxi; Judge James Steele, in his individual capacity;
Judicial Correction Services, Incorporated,

Defendants.

Case No:
1:15-cv-00348-HSO-JCG

**JOINT MOTION TO
STAY PROCEEDINGS**

Plaintiffs Qumotria Kennedy, Richard Tillery, and Joseph Anderson, and Defendants City of Biloxi (“Biloxi”), John Miller, and James Steele (collectively, the “Parties”), hereby respectfully and jointly request that the Court enter an Order staying all proceedings in this litigation as to Defendants Biloxi, Miller, and Steele to permit the Parties to concentrate on settlement negotiations. In support of this joint motion, the Parties state as follows:

1. Plaintiffs filed this proposed class action lawsuit against Defendants Biloxi, Miller, Steele, and Judicial Corrections Services, Inc. (“JCS”) on October 21, 2015.

Plaintiffs Kennedy and Tillery also filed a motion for class certification on the same date.
2. Shortly after the lawsuit was filed, counsel for Defendants Biloxi and Miller approached Plaintiffs’ counsel and indicated a desire to discuss possible settlement of this action.

3. On October 29, 2015, counsel for the Plaintiffs and Defendants Biloxi, Miller and Steele met to discuss the possibility of settlement. Defendant JCS was not a part of this discussion.
4. The Parties agree to continue negotiating in good faith toward a resolution of the claims against Defendants Biloxi, Miller, and Steele.
5. The Parties agree that it will promote judicial economy and limit costs for Plaintiffs and Defendants Biloxi, Miller and Steele if further litigation of this matter as to Defendants Biloxi, Miller, and Steele is stayed pending continuing settlement discussions between the Parties.

Therefore, the Parties respectfully request a stay of all further proceedings and deadlines as to Defendants Biloxi, Miller, and Steele until January 15, 2016, including the deadlines for responding to the Complaint and for further briefing and hearing on Plaintiffs Kennedy and Tillery's motion for class certification. The Parties stipulate that none of the Parties shall construe any Order issued in response to the Parties' Joint Motion to Stay Proceedings as addressing the materiality of any issue, or urgency or necessity of any claim in the Complaint. The Parties also stipulate to file a joint status update with the Court on December 1, 2015.

STIPULATED, DATED AND RESPECTFULLY SUBMITTED THIS 2ND DAY OF NOVEMBER, 2015.

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Attorney for Defendant James Steele

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 2nd day of November, 2015, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following: Defendant City of Biloxi, Defendant John Miller, and Defendant James Steele. I hereby certify that I have served by United States Postal Service or hand delivery this document to the following:

Judicial Correction Services, Incorporated
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Respectfully submitted,

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